UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION 21MC103(AKH)

LESLIE HUGGINS, (AND WIFE, MICHELLE HUGGINS),

07CV9997(AKH)

Plaintiff(s),

NOTICE OF ADOPTION BY
BLUE MILLENNIUM
REALTY LLC OF ANSWER

TO MASTER COMPLAINT

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

PLEASE TAKE NOTICE that defendant BLUE MILLENNIUM REALTY LLC (hereinafter "Blue Millennium") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopts Blue Millennium's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). To the extent that Blue Millennium's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned Matter, Blue Millennium denies the truth of such specific allegations.

WHEREFORE, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York August 10, 2008

HARRIS BEACH PLLC

Attorneys for Defendant
BLUE MILLENNIUM REALTY LLC

 $/_{\rm S}/$

Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23rd Floor New York, New York 10005 (212) 687-0100

TO:

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5th Floor New York, New York 10279 *Liaison Counsel for Plaintiff*

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5th Floor New York, New York 10279 *Liaison Counsel for Plaintiff*

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Liaison Counsel for the Defendants

All Counsel via ECF

CERTIFICATION AS TO SERVICE

The undersigned certifies that on August 10, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

Dated: August 10, 2008

Stanley Goos, Esq. (SG 7062)